

**Brett Freeman**

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**From:** John Brigandi <jbrigandi@salvolawfirm.com>  
**Sent:** Thursday, March 21, 2013 11:47 AM  
**To:** Brett Freeman  
**Subject:** RE: Reid v. DCI Deposition

Brett,

Our \$50,000.00 offer was rejected and was taken off the table by your \$62,500.00 counteroffer. I disagree with your contention that the \$62,500.00 was not an offer to settle by Plaintiff. I was under the impression that you advised your client to reject the \$50,000.00 offer, and further suggested we can get this settlement done for \$62,500.00. DCI is no longer offering the \$50,000.00 settlement. We will need to proceed with DCI's deposition.

John

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**From:** Brett Freeman [mailto:brett@bankruptcypa.com]  
**Sent:** Thursday, March 21, 2013 11:41 AM  
**To:** John Brigandi (JBrigandi@SalvoLawFirm.com)  
**Subject:** RE: Reid v. DCI Deposition

John,

Plaintiff never offered to settle for \$62,500. Rather, as I advised on the phone yesterday, she wanted to take the night to contemplate DCI's latest settlement offer. She wishes to accept DCI's settlement offer of \$50,000.00. I will prepare a draft release and send it to you today.

Thanks,

Brett Freeman  
Sabatini Law Firm, LLC  
216 N. Blakely St.  
Dunmore, PA 18512  
(570) 341-9000  
[Brett@SabatiniLawFirm.com](mailto:Brett@SabatiniLawFirm.com)

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**From:** John Brigandi [mailto:jbrigandi@salvolawfirm.com]  
**Sent:** Thursday, March 21, 2013 11:35 AM  
**To:** Brett Freeman  
**Subject:** RE: Reid v. DCI Deposition

Brett,

I just spoke with my client about settlement in the Reid matter. They advised they do not have the funds to settle for \$62,500.00. Unfortunately, they have to reject Plaintiff's offer.

In light of the foregoing, they have advised they will be attending the deposition on April 3 at 11:00 am in your office. Please confirm the deposition date and time, so I can ensure they prepare proper travel arrangements. Also, will you be serving an Amended Notice of Deposition?

Thanks,

John

John E. Brigandi, Esq.  
The Salvo Law Firm, P.C.

Serving Clients in New Jersey and New York

**PLEASE NOTE OUR NEW ADDRESS IN NEW JERSEY**

185 Fairfield Avenue, Suite 3C/3D  
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(973) 900-8800 (fax)

303 South Broadway, Suite 486  
Tarrytown, New York 10591  
(914) 366-7466  
(973) 900-8800 (fax)

A Woman-Owned Law Firm (Certified by WBENC)

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**From:** Brett Freeman [<mailto:brett@bankruptcypa.com>]  
**Sent:** Wednesday, March 20, 2013 4:24 PM  
**To:** John Brigandi  
**Subject:** RE: Reid v. DCI Deposition

John,

I just tried calling you to discuss, but you were on another call. Plaintiff counters at \$75,000.00.

Thanks,

Brett Freeman  
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[Brett@SabatiniLawFirm.com](mailto:Brett@SabatiniLawFirm.com)

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**From:** John Brigandi [<mailto:jbrigandi@salvolawfirm.com>]  
**Sent:** Tuesday, March 19, 2013 5:16 PM  
**To:** Brett Freeman  
**Subject:** RE: Reid v. DCI Deposition

Brett,

I just spoke with my client regarding a possible settlement. They have authorized me to offer \$45,000.00 as settlement in the Reid case, whereby each party releases one another from all liability. Can you please discuss that figure with your client and let me know whether we are able to settle this matter.

Thanks,

John

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**From:** Brett Freeman [<mailto:brett@bankruptcypa.com>]  
**Sent:** Monday, March 18, 2013 5:09 PM  
**To:** John Brigandi ([JBrigandi@SalvoLawFirm.com](mailto:JBrigandi@SalvoLawFirm.com))  
**Subject:** RE: Reid v. DCI Deposition

John,

Since your client has already agreed that it will respond to additional discovery requests within 14 days, I will agree to reschedule the deposition from March 20, 2013 until April 3, 2013 at 11:00 in my Dunmore office.

Plaintiff is always willing to discuss an amicable resolution to the matter. However, DCI has not yet made a settlement offer. Once DCI makes its initial settlement offer, I will be able to better evaluate the likelihood that a mediation will be successful. In addition, as DCI is in a much stronger financial position than Plaintiff, I would ask that, if the parties agree to mediate, DCI bear all of the costs associated with the mediation. Please let me know if this is something DCI would be interested in. I am available tomorrow before 1:00, if you would like to discuss this further.

Thanks,

Brett Freeman  
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(570) 341-9000

[Brett@SabatiniLawFirm.com](mailto:Brett@SabatiniLawFirm.com)

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**From:** John Brigandi [<mailto:jbrigandi@salvolawfirm.com>]  
**Sent:** Monday, March 18, 2013 4:58 PM  
**To:** Brett Freeman  
**Subject:** RE: Reid v. DCI Deposition

Brett,

My client just advised that April 3, 2012 would work best for DCI's deposition. Please let me know if that is acceptable.

Further, my client also requested that I speak with you about mediation. Since my client will be at your office on that date, would Plaintiff be willing to conduct a mediation during that day or week at your office or nearby?

Thanks,

John

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**From:** Brett Freeman [<mailto:brett@bankruptcypa.com>]  
**Sent:** Monday, March 18, 2013 4:38 PM  
**To:** John Brigandi  
**Subject:** RE: Reid v. DCI Deposition

John,

Currently I am available on April 1 after 11:00, April 2 all day, April 3 after 11:00, April 4 all day, and April 5 after 11:00 to conduct DCI's deposition at my Dunmore office.

Thanks,

Brett Freeman  
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[Brett@SabatiniLawFirm.com](mailto:Brett@SabatiniLawFirm.com)

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**From:** John Brigandi [<mailto:jbrigandi@salvolawfirm.com>]  
**Sent:** Monday, March 18, 2013 4:36 PM  
**To:** Brett Freeman  
**Subject:** RE: Reid v. DCI Deposition

Brett,

What dates are you available during the first week of April to take the deposition. My client advised that the first week of April would be best for the deposition. We would agree to respond to any additional discovery requests within a 14 day period.

Thanks,

John

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**From:** Brett Freeman [<mailto:brett@bankruptcypa.com>]  
**Sent:** Monday, March 18, 2013 3:44 PM  
**To:** John Brigandi ([JBrigandi@SalvoLawFirm.com](mailto:JBrigandi@SalvoLawFirm.com))  
**Subject:** RE: Reid v. DCI Deposition

John,

I am willing to reschedule the deposition to a later date once we agree on a new date. However, until we agree on a new date, I am not agreeing to cancel Wednesday's deposition. Please let me know when your client would be available to sit for the deposition on the following dates: March 21, 22, 25, 27, or 28. In light of the discovery deadline, I cannot agree to reschedule the deposition for a date after March 28, 2013 unless DCI will agree that it will respond to any additional discovery requests within 14 days. If DCI is willing to agree to this, I currently have some availability in the first week of April.

**Again, I will reschedule the deposition once we have agreed in writing on a new date, but until that time I am not agreeing to postpone or move Wednesday's deposition.**

Thanks,

Brett Freeman  
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Dunmore, PA 18512  
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[Brett@SabatiniLawFirm.com](mailto:Brett@SabatiniLawFirm.com)

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**From:** John Brigandi [<mailto:jbrigandi@salvolawfirm.com>]  
**Sent:** Monday, March 18, 2013 3:20 PM  
**To:** Brett Freeman  
**Subject:** Reid v. DCI Deposition

Brett,

I just spoke with my client in the Reid v. DCI matter, and DCI's representative will be unable to attend the deposition scheduled for Wednesday March 20. Unfortunately, we will need to reschedule the deposition. Right now, I do not have any new proposed dates to reschedule, but I am presently working with our client and will have some proposed dates for you shortly. I apologize for any inconvenience this may have caused.

John

John E. Brigandi, Esq.  
The Salvo Law Firm, P.C.

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